

# Chase Declaration

## Exhibit 6

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DEVIN G. NUNES, :  
Plaintiff, : Case No.:  
vs. : 22-cv-1633 (PKC)  
NBCUNIVERSAL MEDIA, LLC, :  
Defendant. :

- - - - -X

MEDIA VERSION

(THIS TRANSCRIPT INCLUDES ALL TESTIMONY  
INCLUDING THOSE PORTIONS DESIGNATED  
CONFIDENTIAL - ATTORNEYS' EYES ONLY)  
Pages 103-137 are designated  
Attorneys' Eyes Only and included herein.

Remote Videotaped Deposition of JILIAN SOUZA

Wednesday, October 25, 2023

10:07 a.m. (EDT)

Job No. 6475960

Pages: 1 - 142

Reported by: Dana C. Ryan

1 congressional office before moving over to the  
2 intelligence committee?

3 A Oh, gosh, it was a while ago; so I  
4 don't remember exactly. I know it was a few  
5 months at least.

6 Q Okay. And did you communicate with  
7 Mr. Ciarlante during that 2019 to 2021 period?

8 A Yes. I would say we're personal  
9 friends now so I communicate and still talk to  
10 Nick.

11 Q Okay. And during that time period in  
12 particular, you would communicate I assume in  
13 person. But did you communicate over email and  
14 text as well?

15 A Yes.

16 Q You did, okay.

17 Aside from friendly personal  
18 communications, do you recall communicating with  
19 him about anything business related or work  
20 related?

21 A Nick was always viewed as, like,  
22 someone who really had their stuff together down  
23 at the committee. So a lot of times if we were  
24 trying to get an answer on something or were  
25 having trouble getting ahold of Devin, sometimes

1 Nick would be, like, the backup, to call him and  
2 say, hey, what's going on.

3 So I'm sure there were occasions where  
4 we talked about business, probably mostly  
5 logistical.

6 Q Okay. And have you spoke to  
7 Mr. Ciarlante about this case at all?

8 A Not that I can recall. Not that I can  
9 recall.

10 Q Okay. Were there other -- again,  
11 excepting your husband of course, were there other  
12 staff members from HPSCI that you were regularly  
13 in contact with while you worked for Mr. Nunes?

14 A I mean, I think -- the congressman  
15 really wanted there to be kind of synergies  
16 between the staff just because, like I said,  
17 facilitation and logistics was a big part of  
18 making sure his days worked well. So oftentimes  
19 we would get together as a staff between the intel  
20 committee and the personal office.

21 So I would say I at least knew most of  
22 the people if not all of the staff at the intel  
23 committee and would see them from time to time.  
24 Sometimes they would drop in the personal office  
25 if they were kind of on their way to lunch; some

1 of them are my friends.

2 So it was just a mixed bag if that --

3 Q Got it.

4 A -- makes sense.

5 Q I see. I see.

6 Okay. When you were working for

7 Mr. Nunes, how would you communicate with him

8 other than in person?

9 A Mostly text message and phone call.

10 Q Okay.

11 A And sometimes over his personal Gmail,

12 but he never used his official email account.

13 Q I see.

14 A I should say when I was chief of staff.

15 Q Right. Right.

16 Do you happen to recall what his

17 personal Gmail account was?

18 A No. We all had the -- I should say,

19 when I say all of us, those of us who worked on

20 the campaign had devinnunes.net email addresses,

21 so it would have been a devinnunes.net email if I

22 recall correctly.

23 Q I see.

24 So it was -- it was a Gmail-based

25 platform, but the URL was devinnunes.net?

1           A           I'm sorry. He might have had a Gmail  
2           and a devinnunes.net, but I can't recall.

3           Q           Okay.

4           A           99.999 percent, I say that generally  
5           speaking, was text message or phone call or in  
6           person.

7           Q           Okay. Okay. Let me ask you a little  
8           bit about devinnunes.net.

9                       Is that still an active email -- well,  
10          first of all, you said you have a devinnunes.net  
11          email address?

12          A           I did. It's no longer active.

13          Q           Do you know when it was turned off?

14          A           I believe right around the time  
15          Mr. Nunes left Congress.

16          Q           Okay. What did you use that email  
17          address for?

18          A           All campaign-related activity.

19          Q           Okay. What was devinnunes.net?

20          A           You mean like what was --

21          Q           What was -- what was its purpose?  
22          Like, what was Devin -- like, the Web site itself?

23          A           Oh, it was, like, our campaign Web  
24          site. And, actually, now I think it's like  
25          devinnunes.com, but the email was devinnunes.net.

1 So I had an email that was, like,  
2 Jilian@devinnunes.net and someone else it would be  
3 their first name and devinnunes.net.

4 So it was just like the email we used.

5 Q I see.

6 Did you have any involvement in  
7 creating content for that Web site, devinnunes.com  
8 or .net or whatever it ultimately became?

9 A Yes. I mean, as chief of staff and  
10 kind of a top advisor on the campaign, I would  
11 review material.

12 Q Okay. Are you aware that on that Web  
13 site Mr. Nunes touted that he stopped speaking to  
14 mainstream media and urged other Republicans in  
15 Congress to do the same?

16 Do you recall -- do you recall that?

17 A Yes.

18 Q Can you tell me more about Mr. Nunes  
19 cutting off the mainstream media? Like, what did  
20 that mean exactly?

21 A It meant that he stopped speaking to  
22 mainstream media outlets.

23 Q So does that mean he wouldn't give  
24 interviews to mainstream media outlets?

25 A Yeah, that we wouldn't communicate with

1       them or give interviews.

2           Q       What if a mainstream media outlet  
3       reached out for comment on a story? Would he  
4       offer comment?

5           A       No.

6           Q       So if a mainstream media outlet reached  
7       out with a story that Mr. Nunes knew was false, he  
8       just knew was some cockamamie idea, would he deny  
9       it? Or would he just --

10                  MR. FLYNN: Objection calls for  
11       speculation.

12                  THE WITNESS: I was not the  
13       communications director; so I, you know, can't say  
14       exactly how it worked. But I think that in  
15       practice he meant we weren't speaking to them at  
16       all or providing any comments.

17           BY MR. CHASE:

18           Q       Okay. Which news outlets do you  
19       consider part of the mainstream media?

20           A       I think Mr. Nunes described it as any  
21       outlets who had published false information about  
22       him who were not willing to retract those stories.

23           Q       Okay. So earlier we discussed how he  
24       sued The Washington Post.

25                  Does he consider The Washington Post



1 part of the mainstream media?

2 A Yes.

3 Q CNN?

4 A Yes.

5 Q NBC?

6 A I assume so, yes.

7 Q Okay. Let's see. Where do you get  
8 your news, Ms. Souza?

9 A My news now?

10 Q Yeah.

11 A I think a variety of outlets. Twitter,  
12 Politico, articles that are sent to me.

13 Q Okay. Do you watch cable news at all?

14 A Occasionally at the office, but I don't  
15 have cable at home so only in the office.

16 Q Got it.

17 What news channel is generally playing  
18 in the office?

19 A We usually have a number of news  
20 channels playing in the office. If I'm in my  
21 office, I usually play Fox.

22 Q Okay. Do you ever watch CNN?

23 A If it's on in our lobby in our  
24 building, but I wouldn't ever choose to watch CNN.

25 Q Why is that?

1           A           Just because I think the news is pretty  
2   left leaning which is not really my affiliation or  
3   cup of tea.

4           Q           Got it.

5                       Do you ever watch MSNBC?

6           A           No.

7           Q           Do you have thoughts on MSNBC?

8           A           I mean, I think like CNN, it's very  
9   left leaning. I should say, like, a lot of these  
10   news outlets are in airports, in my office, so I  
11   will see them occasionally, but I don't select to  
12   watch them.

13          Q           You don't seek them out.

14          A           No.

15          Q           Okay. Have you ever seen the  
16   Rachel Maddow show?

17          A           I mean, not that I've, like, watched a  
18   full Rachel Maddow show, but I've seen her on TV  
19   before.

20          Q           Do you have any -- well, you said you  
21   don't really watch it, so I won't ask that next  
22   question if you have thoughts on her, so -- well,  
23   I may as well.

24                       Do you have any thoughts on Rachel  
25   Maddow and her show?

1           A           I mean, I think she's very left  
2    leaning.

3           Q           Okay. Okay. Earlier you mentioned  
4    that Mr. Nunes has a Gmail address. Do you recall  
5    what you emailed him about, if ever?

6           A           No. If I recall, he may have used  
7    that, like, on his iPad to read the news on  
8    flights. But, again, it's been a long time so I  
9    can't say that's for certain.

10          Q           Okay. Was there a general -- well, did  
11    he have a house.gov email address when he worked  
12    there, "he" being Mr. Nunes?

13          A           Yes.

14          Q           Did he ever use it?

15          A           When I first started in the office, he  
16    did. Like if I -- when I was legislative  
17    director, when I first started, if I needed to ask  
18    him a legislative question, sometimes I would  
19    email that to him. But he stopped using it kind  
20    of shortly after -- or sometime in the first  
21    couple of years I was legislative director.

22          Q           Do you know why he stopped using it?

23          A           I think he just didn't think it was  
24    secure.

25          Q           Okay.

1           A           I should say, though, that the email  
2           address stayed active so that Jennifer could add  
3           things to his calendar because the calendar and  
4           the email address were connected.

5           Q           I see. I see.

6                       Do you have an impression of Mr. Nunes'  
7           views on the FBI?

8           A           Generally speaking?

9           Q           Yeah.

10          A           I think he's said publicly on many  
11          instances that there's corruption at the FBI.

12          Q           Do you have an understanding of whether  
13          Mr. Nunes trusted the FBI?

14          A           I mean, I think that there was a lack  
15          of trust with senior leaders at the FBI. I think  
16          that's fair to say given that he believed there  
17          was corruption at the senior levels of the FBI.

18          Q           Okay. What was your email address when  
19          you worked on Mr. Nunes' congressional staff?

20          A           I believe it was  
21          jilian.plank@mail.house.gov.

22          Q           And do you currently have access to  
23          that work email address you used?

24          A           No.

25          Q           No.

1                   So you left in May of 2022. How much  
2   time was there between you leaving and  
3   Representative Conway taking over?

4           A       I don't recall the specific date, but  
5   the special election was sometime in June.

6           Q       Okay.

7           A       And Connie Conway took over, I think,  
8   shortly after she won the special election.

9           Q       Okay. And is it your understanding  
10   that all of the -- well, let me back up for a  
11   second.

12                   Do you know if any of Mr. Nunes'  
13   staffers stayed on with Representative Conway?

14          A       I think a couple did.

15          Q       Do you know who they are?

16          A       I know Nicky Henderson did. I know  
17   that -- I'm forgetting his last name. He worked  
18   with us for a short period. He was an intern in  
19   Mr. Nunes' office. Noah. I'm forgetting his last  
20   name. I apologize.

21                   In the district office, I can't recall  
22   specifically. There may have been couple of  
23   people who stayed on in California.

24          Q       Okay. And for all the other people who  
25   didn't stay on with Representative Conway, is it

1 your understanding that all of their  
2 communications, email accounts, documents were all  
3 deleted?

4 A I assume so per normal House protocol.

5 Q Okay.

6 A Also Jennifer Morrow stayed on with  
7 Connie Conway.

8 Q Okay. Mr. Nunes -- are you aware that  
9 Mr. Nunes filed a number of defamation lawsuits  
10 while he was a sitting congressman?

11 A Yes, I'm generally aware.

12 Q Okay. At any point in time, did he  
13 direct you to preserve documents in relation to  
14 those lawsuits?

15 A Not that I can recall. Like I said, he  
16 asked us to retain his schedule in case he needed  
17 it for litigation. But beyond that, I don't  
18 believe so.

19 Q And -- okay. Do you recall him asking  
20 any staffers to preserve documents in relation to  
21 those litigations that he filed while he was a  
22 sitting congressman?

23 A Not that I know of.

24 Q And the same question with respect to  
25 this lawsuit. Are you aware of him providing

1 instructions to preserve documents to any staffers  
2 in his congressional office in relation to this  
3 lawsuit?

4 A Not that I can recall.

5 Q And are you aware that -- of whether he  
6 provided any document preservation notice to  
7 anyone who worked for him in -- as an HPSCI  
8 staffer in relation to this lawsuit?

9 A I don't know.

10 Q Okay. And just to confirm, you  
11 previously testified that staffers regularly  
12 communicated by email and text message while he  
13 was in office; is that correct?

14 A With each other, you mean?

15 Q With each other, yes.

16 A Yeah.

17 Q Okay. And with the congressman?

18 A Most of the staff communicated with the  
19 congressman via text message, phone call or in  
20 person.

21 Q And you -- okay.

22 And none of them were instructed to  
23 preserve text messages in relation to this  
24 litigation; is that correct?

25 A Not that I know of.

1 Q Okay. Notwithstanding his -- the lack  
2 of direction from Mr. Nunes, did you preserve any  
3 documents from his congressional office?

4 A I think there were a few that I saved,  
5 like, relevant to the work I was kind of most  
6 proud of. But other than that, no.

7 Q Nothing in relation -- that relates to  
8 this litigation; is that fair?

9 A Not that I know of.

10 Q Okay. Did any lawyers supervise the  
11 winding-up process of Mr. Nunes' office?

12 A You mean the winding down?

13 Q Yes, the winding-down process. Sorry.

14 A No, that's not typical. It's usually  
15 the Clerk of the House that oversees that.

16 Q Okay. Was there a lawyer -- and I'm  
17 taking a step back. This is just -- strike that.

18 Was there a lawyer that worked out of  
19 Congressman Nunes office at any time?

20 A Out of our personal office?

21 Q Yes, the -- the congressional office.

22 A I don't know that anyone had a law  
23 degree.

24 Q Okay. But there wasn't anyone on your  
25 staff who was, you know, advising the congressman



1 CERTIFICATE OF NOTARY PUBLIC

2

3 I, Robert Calvert, Notary Public for the  
4 State of New York, do hereby certify that the  
5 foregoing witness came before me on October 25,  
6 2023, and placed under oath for the testimony  
7 provided.

8 I am neither counsel for, related to,  
9 nor employed by any of the parties to this case  
10 and have no interest, financial or otherwise, in  
11 its outcome.

12

13

14

15

16 Sworn and subscribed to before me this  
17 8th day of November, 2023.

18

19

20 Robert Calvert

21 NOTARY PUBLIC

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